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April 19, 2013

Brian Jones
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00144345

Re: Response to the Request for Additional Information dated 03/19/2013 concerning the
Amended Mid-Year and Year End Reports, covering 01/01/2011 - 12/31/2011 and filed 09/19/2012

Dear Mr. Jones:

This letter is filed as a response to the Commission's Requests for Additional Information (RFAI's) dated March 19, 2013. We understand you have a duty to notify us of the federal regulations governing contributions received by PACs registered with the Commission. We are fully aware of the regulations and the prohibitions on types of PAC receipts. It is precisely our knowledge of the regulations which led us to file the amendments in question in order to correct the public record with respect to the total amount of contributions received (and source of those funds) during 2011.

Without completely restating the explanations provided in our amendments, I will briefly summarize the matter in question. An extensive and voluntary audit of our PAC receipts led us to the conclusion that just over \$10,000 in deductions were deposited into our PAC in error in 2011. This resulted from a change in payroll services provider in the midst of corporate reorganizations the same year. Payroll deductions intended for affiliated PACs were duplicated and deposited into our PAC account as well. Because the payroll data supporting the deductions also matched the deposits being made, the problem was masked in our regular bank reconciliation process.

As you know, in the wake of our discovery and confirmation that PAC funds should be transferred out, we did so immediately (on August 22, 2012) and filed appropriate amended reports within 30 days. Additionally two payroll systems were combined under one centralized payroll provider, and we added a closer monitoring by the Accounting groups to prevent duplicate deduction records.

Since we have already taken the requisite corrective action and transferred-out the monies identified as erroneous deposits, your letters appear to merely notify us of your receipt of our amendments and our corrective action. As you know, we received (and adequately answered) only one additional RFAI during the 2011-2012 election cycle - and none since 2002. We respectfully hope you take this into consideration when reviewing our record to evaluate if further action is needed. If any our understandings is incorrect, please contact me immediately in order to lay this matter to rest.

Sincerely,

Alok Goel
Treasurer
Sanofi US Services Inc. Employees' Political Action Committee
